

Along with AOPA, I strongly oppose the proposal, which in effect would force pilots to switch to 406 MHz ELTs, thereby hindering, rather than improving, aviation safety.

I own & operate my 1951 Cessna 170A for recreational flight every few weeks, & it would be quite costly to switch from the 121.5 MHz ELT to a 406 MHz ELT, which ultimately would affect my flying frequency & thus my safety.

The FAA has estimated that replacing 121.5MHz ELTs with 406MHz ELTs would cost \$1,000 to \$2,000, which adds up to increased costs across the industry of \$300 million to \$500 million. The out-of-pocket expense would drain limited resources from maintenance, or prevent an aircraft owner from investing in equipment that would have a direct benefit for safety.

The mandate might leave pilots unable or unwilling to purchase other devices such as emergency position indicating radio beacons (EPIRBs), of which an estimated 9,600 are now being carried by pilots. Others use personal locator beacons, cell phones with GPS tracking, and commercial tracking devices that provide the same or better tracking than 406 MHz ELTs. AOPA believes that aircraft owner and pilots should be allowed to decide what technology works best in the particular cases of their flight operations.

I feel that a mandate to install 406 MHz ELTs would quickly become outdated, while freezing GA's use of technology at 2013 levels.

I also oppose any mandate that relies on only one technology, and has pointed out that the plan would soon be rendered moot by the FAA's mandate to equip aircraft with ADS-B Out by the year 2020. That technology will provide the aircraft's last known position and registration number to air traffic control.

I think that the FAA should remain the sole authority for regulations affecting aviation, and that the FCC should defer on issues of aviation safety rather than impose an unnecessary regulatory burden.

Meanwhile, although satellites discontinued monitoring 121.5 MHz in February 2009, pilots and air traffic controllers continue to guard the frequency, reaffirming that the 121.5 MHz ELT remains a viable and affordable option for pilots.

Regards,

Michael W. Dufford